

# EXHIBIT 39

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**RE: LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC**

1 message

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**Eric Robert Freiman** <EFreiman@phillipslytle.com>

Wed, May 28, 2025 at 11:20 AM

To: Jocelyn Stewart <jocelyn@ucmj-defender.com>

Cc: Jen Bassetti <jen@ucmj-defender.com>, "Myles K. Bartley" <MBartley@phillipslytle.com>

Good Afternoon,

Please find attached above the objections and responses of Sameer Ananda and Maranda Lujajohnson to the non-party subpoenas dated May 19, 2025. Thank you for your attention to this matter.

Regards,

Eric Freiman

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**From:** Jen Bassetti <jen@ucmj-defender.com>

**Sent:** Friday, May 9, 2025 7:27 PM

**To:** Eric Robert Freiman <EFreiman@phillipslytle.com>; Myles K. Bartley <MBartley@phillipslytle.com>

**Cc:** Jeremy Roller <jroller@aretelaw.com>; Janet Fischer <jfischer@aretelaw.com>; Kaila Greenberg <kgreenberg@aretelaw.com>; Rick Houghton <rhoughton@mbssmartlaw.com>; Quinn Murphy <qmurphy@mbssmartlaw.com>; Michelle Stratton <mstratton@mbssmartlaw.com>; Christian McGuire <cmcguire@mbssmartlaw.com>; christianm.mcguire@gmail.com; lfriedl@grsm.com; Kevin Craig <kcraig@grsm.com>; Seaasbestos@grsm.com; Joshua Severit <jseverit@mgmlaw.com>; Janice Sova <jsova@mgmlaw.com>; David Fisher <dfisher@mgmlaw.com>; Maggie Weilmuenster <mweilmuenster@mgmlaw.com>; Daniel R. Olsen <dolsen@mgmlaw.com>; Olsen\_law@comcast.net; Talis Abolins <tabolins@mctlaw.com>; Jocelyn Stewart <jocelyn@ucmj-defender.com>

**Subject:** LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC

**WARNING:** The sender of this email could not be validated and may not match the person in the "From" field.

**ATTENTION EXTERNAL EMAIL:** Use Caution with attachments and links!

Good afternoon Mr. Freiman and Mr. Bartley,

Thank you for your email conveying that your office represents Sameer Anand and Maranda Lujajohnson. Attached find Notices of Intent to Subpoena with 10-days notice and a Subpoena dated for service on May 19, 2025. Thank you for accepting receipt of the subpoenas on behalf of your clients.

Plaintiff would like to depose both witnesses within 2 weeks of receipt of their document production. Please provide dates of availability for both witnesses between June 19 - July 3. We will schedule the deposition and send an updated Subpoena and zoom link upon confirmation.

Thank you.

Jen L. Bassetti-Sirjesse

**Litigation Paralegal**

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**Eric Robert Freiman**

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**2 attachments**

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408K

 **2025.05.28 Objs Responses to SDT (S. Anand)(1886098.1)-C.pdf**  
402K